

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al</i></div> <div>Debtors</div>	<div>PROMESA Title III</div> <div>No. 17 BK 3283-LTS</div> <div>Re: ECF No. 16481</div> <div>(Jointly Administered)</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al</i></div> <div>Debtors</div>	<div>PROMESA Title III</div> <div>No. 17 BK 3283-LTS</div>

**MOTION TO JOIN OBJECTION TO “SECOND AMENDED TITLE III JOINT PLAN
OF ADJUSTMENT OF THE COMMONWEALTH OF PUERTO RICO, ET. AL.”
(DOCKET NO. 16481)**

TO THE HONORABLE COURT:

Now Comes Vicente Pérez Acevedo and Corporación Marcaribe Investment (“Petitioners”) through their attorney states as follows:

1. Petitioners file this motion to join the motion of objection to the “Second Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et. al.” at Docket 16481 (“Objection Motion”).

2. The Objection Motion was filed in order to object the second amended plan for classifying inverse condemnation claimants in “Class 51 generally labeled as “Eminent Domain Claim”, for totally impairing inverse condemnation’s claims either by ignoring it or attempting to covert the claim into general unsecured claim.

3. The Petitioners have an inverse condemnation claim against Debtor. (See Claims #166 and #167).

4. Petitioners hereby join the Objection Motion as they have similar claims and allegations.

5. Petitioners reserve their right to adopt any argument or allegations that it has not expressly joined in the future in this or other proceedings.

WHEREFORE, Vicente Perez-Acevedo and Marcaribe, Petitioners, request that this Honorable Court allows them to join in as stated above and for any other request deemed necessary and proper.

Dated: May 3, 2021

RESPECTFULLY SUBMITTED by Debtor, through Counsel
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CERTIFICATE OF SERVICE

I, Carmenelisa Perez-Kudzma, hereby state that a copy of the Motion to Join Objection to Second Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico was served upon all ECF participants including the Commonwealth of Puerto Rico on May 3, 2021.

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Dated: May 3, 2021

RESPECTFULLY SUBMITTED by Debtor, through Counsel
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